



Arizona APCO Chapter

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October 9, 1996

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Members of the Commission:

Re: Comments to CC Docket No. 92-105

With respect to the request from the United States Department of Justice for a national N11 code, we respectfully submit the following information for your consideration.

1. The first premise that 9-1-1 is overloaded because of misuse is incorrect in most areas. It is true that some areas have a problem, but it does not affect a vast majority of jurisdictions. Most of the problem areas would be better helped with better user education in the proper use of 9-1-1.
2. Although 9-1-1 is thought to be a universal application, it must be pointed out that areas exist within the United States that do not have 9-1-1 capability. To begin implementation of a non-emergency general phone number could be very detrimental to completing the installation of 9-1-1.
3. It must also be remembered that other non-emergency assistance is requested. Fire and medical requests make up a significant portion of the inquiries. This docket only mentions police and does not address medical or fire. The natural assumption would be to add other N11 trunks for these services. Any addition of trunks is going to present the need for expanded capability in the phone systems as well as the need for extra people. Many agencies do not have the financial resources to pay for the extra equipment or personnel.
4. Many agencies already have seven digit non-emergency phone numbers and have expended many hours in training the public to use these numbers. The seven digit numbers effectively handle most of the requests for non-emergency assistance.

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5. It is not clear in this presentation who would pay for the on going network charges for this new service. The cost of upgrading the network is also not addressed. It appears that this request will again place an unfunded mandate upon local emergency service providers. Aside from the equipment and service aspects, this proposal does not address the cost of the additional personnel that will be required to answer these phone calls.
6. Another issue not addressed is the origin and maintenance of the data base needed for selective routing of calls. The question arises, who is going to be responsible for the creation and maintenance of this data base? Who is going to be responsible for the cost of the data base, not to mention questions of liability for incorrect data base entries?

While we agree with the Department of Justice on addressing the misuse of 9-1-1, we do not agree that N11 is the optimum alternative. Too many questions exist as to the work and cost impact of such an action. We will be happy to assist the Department of Justice in their search for viable alternatives and request that any action in reference to CC Docket No. 92-105 is taken only after exhaustive research and obtaining consensus from emergency service providers.

Respectfully,

Gary Elliott
President, Arizona Chapter of APCO